

May 10, 2017

By ECF

Honorable Dora L. Irizarry
United States District Court
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: *United States v. Ying Lin*, 15 Cr. 601 (DLI)

Dear Judge Irizarry:

I write with the consent of the government to respectfully request permission to file an oversized reply brief of no more than 18 pages in connection with Ms. Lin's motion to dismiss. The government filed a 37-page opposition brief in which it raised numerous legal issues necessitating a detailed reply, including its reliance on a TSA regulation that is not cited, quoted, or referenced anywhere in the S-1 indictment.

Thank you for your consideration.

Respectfully submitted,

/s/

Deborah Colson
(212) 257-6452

cc: AUSA Alex Solomon
AUSA Doug Pravda
AUSA Ian Richardson